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HEARING DATE & TIME:
June 24, 2025 at 9:30 a.m.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re: 68 Burns New Holdings, Inc.

Chapter 11
Case No. 24-45157-NHL

Debtor.

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**AMENDED NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY,
DISMISSAL OR CONVERSION PURSUANT TO 11 U.S.C. § 362(d)(2) and (d)(3),
and/or 11 U.S.C. § 1112(b)**

PLEASE TAKE NOTICE, that upon the annexed Affirmation of RICHARD DuVALL, ESQ., dated May 5 ,2025, the exhibits attached hereto and referenced herein and the accompanying Memorandum of Law, Eric Goldfine as Trustee of the Eric Goldfine Self Employment Retirement Plan and Trust will move this court on the 24th day of June, 2025 at 9:30 o'clock in the forenoon of that, or as soon thereafter as counsel may be heard, for an Order, pursuant to 11 U.S.C. § 362(d)(2) and (d)(3) of the Bankruptcy Code, lifting the automatic stay to permit movant to continue to conclusion of its mortgage foreclosure action pending in the Supreme Court of the State of New York, Dutchess County and/or pursuant to 11 U.S.C. § 1112(b) dismissing this case for cause;

PLEASE TAKE FURTHER NOTICE, that the hearing will be held remotely via Webex before the Hon. Nancy Hershey Lord in her Courtroom at the United States Bankruptcy Court for the Eastern District of New York, Conrad B. Duberstein U.S. Courthouse, 271-C Cadman Plaza East, Suite 1595, Brooklyn, NY 11201-1800.

PLEASE TAKE FURTHER NOTICE that all participants must register with eCourt Appearances in advance of all telephonic and videoconference appearances. eCourt Appearances registration is required by both attorneys and non-attorney participants and can be accessed through the Bankruptcy Court website at <https://ecf.nyeb.uscourts.gov/cgi-bin/nyebAppearances.pl>

PLEASE TAKE FURTHER NOTICE that those unable to access eCourt Appearances must email Judge Nancy Hershey-Lord's Courtroom Deputy at nhl_hearings@nyeb.uscourts.gov at least two (2) business days prior to the hearing. Your email must include your name, the case number(s), who you represent (if you are an attorney), hearing date, and phone number.

PLEASE TAKE FURTHER NOTICE, that pursuant to Local Bankruptcy Rule 9006-1, opposing affidavits and answering memoranda, if any, shall be served on the undersigned so as to ensure actual receipt no later than seven (7) days before the return date.

Dated: May 6, 2025
Poughkeepsie, New York

**Eric Goldfine Self-Employed Retirement Plan
and Trust**

By its Attorneys Mackey Butts & Whalen

By: 

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